

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DISTRICT**

JP MORGAN CHASE BANK, NATIONAL
ASSOCIATION,

Plaintiff,

v.

ROBERT KOWALSKI, AKA ROBERT M.
KOWALSKI; UNKNOWN OWNERS AND
NON-RECORD CLAIMANTS; CHICAGO
TITLE LAND TRUST COMPANY s/i/i TO
BRIDGEVIEW BANK GROUP FKA
BRIDGEVIEW BANK AND TRUST COMPANY,
AS TRUSTEE UNDER TRUST AGREEMENT
DATED APRIL 24, 1993 AND KNOWN AS
TRUST NUMBER 1-2228; MARTHA
PADILLA; FEDERAL DEPOSIT INSURANCE
CORPORATION, AS RECEIVER FOR
WASHINGTON FEDERAL BANK FOR
SAVINGS,

Defendants.

Case No. 1:19-CV-05770

1512 W. Polk Street
Chicago, IL 60607

PRINCIPAL PARTIES' JOINT STATUS REPORT ON DISCOVERY

The principal parties in this litigation, Plaintiff JPMorgan Chase Bank, N.A. (“Chase”), Defendant Federal Deposit Insurance Corporation, as Receiver for Washington Federal Bank for Savings (“FDIC-R”), and Defendant Martha Padilla (“Padilla”) (collectively, the “Parties”) hereby jointly submit this Status Report pursuant to Court Order. (*See* Dkt. 196).

A. STATUS OF APPRAISAL OF PROPERTY.

1. In a Joint Status Report filed on April 25, 2022 (Dkt. 195), the Parties reported that they were interested in a second pre-trial settlement conference, subject to Chase and FDIC-R’s precondition that they be permitted to complete a full appraisal and interior inspection of the subject property.

2. The appraiser was granted interior access for an appraisal on May 23, 2022, and the full appraisal and report is expected on or about May 26, 2022.

B. PRE-TRIAL SETTLEMENT CONFERENCE.

1. Accordingly, the Parties are prepared to proceed with a pre-trial settlement conference.

2. Magistrate Judge McShain previously has advised of her availability on June 14, 2022 from 9 am – 12 pm, and the Parties would like to schedule a conference on this date and time.

C. ANY OTHER ISSUES TO REPORT TO THE COURT.

None.

SUBMITTED JOINTLY AND BY AGREEMENT OF THE PARTIES:

Date: May 24, 2022

**PLAINTIFF JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION**

/s/ Shana A. Shifrin

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DEFENDANT MARTHA PADILLA

/s/ Joseph R. Ziccardi

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**DEFENDANT FEDERAL DEPOSIT
INSURANCE CORPORATION,
AS RECEIVER FOR WASHINGTON
FEDERAL BANK FOR SAVINGS**

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/s/ Rick Rein

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